## Exhibit 16

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IN THE UNITED STATES DISTRICT COURT
1
        FOR THE DISTRICT OF NEW JERSEY
2
                CAMDEN VICINAGE
3
    IN RE: VALSARTAN, : MDL NO. 2875
    LOSARTAN, AND
4
    IRBESARTAN PRODUCTS
                            : CIVIL NO.
    LIABILITY LITIGATION :
5
                               19-2875
                              (RBK/JS)
6
    THIS DOCUMENT APPLIES :
                               HON. ROBERT
7
    TO ALL CASES
                               B. KUGLER
8
           - CONFIDENTIAL INFORMATION -
           SUBJECT TO PROTECTIVE ORDER
9
                    VOLUME II
10
11
                 April 30, 2021
12
13
14
           Continued videotaped remote
   deposition of BANDARU VENKATA RAMARAO,
   taken pursuant to notice, was held via
15
   Zoom Videoconference, beginning at 6:13
16
   p.m., India Standard Time, on the above
   date, before Michelle L. Gray, a
17
   Registered Professional Reporter,
   Certified Shorthand Reporter, Certified
18
   Realtime Reporter, and Notary Public.
19
20
21
          GOLKOW LITIGATION SERVICES
       877.370.3377 ph | 917.591.5672 fax
22
                 deps@golkow.com
23
24
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1
                 And that was a violation of
           Ο.
2
   cGMP and the regulatory requirements
   applicable, correct?
4
           Α.
                 Yeah.
5
                 And again, we talked about
           Ο.
6
         I'm not going to go back to the
7
   scientific literature, but the result of
8
   that was that NDMA ended up in the
9
   valsartan, which is something that causes
10
   cancer, correct?
11
           Α.
                 Yes.
12
                 And the -- rephrase.
           Ο.
13
                 In going back to the FMEA
14
   where you assessed that risk and that
15
   hazard, it was assessed at the highest
16
   level because people ingesting NDMA at
17
   the levels that were found in these pills
18
   is something that will increase their
19
   risk for cancer, correct?
20
           Α.
                 Yes.
21
                 MR. ABRAHAM: Objection.
                                             Ι
22
           think that's outside the scope of
23
           his topic here.
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BY MR. SLATER:

24